

Patrick C. McDonnell, Esq.
Nevada Bar No. 13188
patrick@michaelsonlaw.com
MICHAELSON & ASSOCIATES, LTD.
2200 Paseo Verde Parkway, Suite 160
Henderson, Nevada 89052
Tel: (702) 731-2333

Antonio M. Romanucci (*Pro Hac Vice*)
Bhavani Raveendran (*Pro Hac Vice*)
Javier Rodriguez, Jr. (*Pro Hac Vice*)
aromanucci@rblaw.net
b.raveendran@rblaw.net
jrodriguez@rblaw.net

ROMANUCCI & BLANDIN, LLC
321 North Clark Street Suite 900
Chicago, Illinois 60654
Telephone: (312) 458-1000

Benjamin J. Crump (*Pro Hac Vice*)
ben@crumplaw.com
CRUMP LAW
717 D Street N.W., Suite 310
Washington, D.C. 20004
Phone: 800-859-9999

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARCIA WELLS and TEENA ACREE,
individually and as Co-Special Administrators of the
Estate of Byron Lee Williams, Deceased, et al.,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.,

Defendants.

CASE No.: 2:21-cv-01346

**PLAINTIFFS' MOTION FOR
LEAVE TO FILE EXHIBIT 1
UNDER SEAL**

1 Plaintiffs MARCIA WELLS and TEENA ACREE, individually and as Co-Special
 2 Administrators of the Estate of BYRON LEE WILLIAMS, Deceased, TINA LEWIS-
 3 STEVENSON, individually as an heir, GWENDOLYN LEWIS, individually as an heir; ROBYN
 4 WILLIAMS, individually as an heir, and DEWAIN LEVIS, individually as an heir, by and
 5 through their attorneys, MICHAELSON & ASSOCIATES, LTD., ROMANUCCI & BLANDIN,
 6 LLC., and CRUMP LAW, pursuant to Local Rule 10-5(b) and to the stipulated protective order
 7 entered in this matter (ECF 42), hereby moves this court to enter an Order granting Plaintiffs
 8 permission to file their Exhibit 1 to Plaintiffs' Response to Defendants' Motion for Summary
 9 Judgement under seal. In support thereof Plaintiffs state as follows:

- 10 1. There is an Agreed Protective Order in this case preventing the disclosure of
 11 confidential information (ECF 42).
- 12 2. Local Rule 10-5 states that "Unless otherwise permitted by statute, rule or prior Court
 13 order, papers filed with the Court under seal shall be accompanied by a motion for
 14 leave to file those documents under seal and shall be filed in accordance with the
 15 Court's electronic filing procedures ... All papers filed under seal will remain sealed
 16 until such time as the Court may deny the motion to seal or enter an order to unseal
 17 them, or the documents are unsealed pursuant to Local Rule."
- 18 3. The Plaintiffs have filed their non-confidential Exhibits in support of their Response
 19 to Defendants' Motion for Summary Judgement.
- 20 4. Plaintiffs seek leave to file the following Confidential Exhibits under seal as exhibits
 21 in support of their response to Defendants' Motion for Summary Judgement:
 22 a. Exhibit 1: [LVMPD 000001-000052] 2019-11-26 FIT Report
- 23 5. Plaintiffs do not wish to disclose any confidential information without this Court's
 24 guidance and permission.
- 25 6. Plaintiffs are not seeking to delay any matter in this case or cause prejudice to the
 26 parties.
- 27 7. Plaintiffs are seeking to comply with the Agreed Protective Order and protect
 28 discovery issued in this matter.

1 WHEREFORE, Plaintiffs respectfully requests that this Honorable Court enter an Order
2 granting Plaintiffs permission to file Exhibit 1 to Plaintiffs' Response to Defendants' Motion for
3 Summary Judgement under seal and any further relief that this Court deems appropriate and just.

4 **Dated: June 21, 2023**

5
6 Respectfully Submitted,

7
8 /s/ Bhavani Raveendran.

9 *One of Plaintiffs' Attorneys*

10
11 Antonio M. Romanucci (*pro hac vice*)

12 Bhavani K. Raveendran (*pro hac vice*)

13 Javier Rodriguez, Jr. (*pro hac vice*)

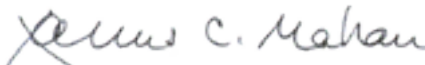
14 **ROMANUCCI & BLANDIN, LLC**

15 321 N. Clark St., Ste. 900

16 Chicago, IL 60654

17 (312) 458-1000

18
19 IT IS SO ORDERED May 1, 2024.

20
21 
22 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing on June 21, 2023, and upon acceptance of this filing, PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBIT 1 UNDER SEAL will be served upon on all Defendants by Email at the below listed address via the CM/ECF system.

Defendants Las Vegas Metropolitan Police Department, Sheriff Joe Lombardo, Officer Patrick Campbell, Officer Benjamin Vasquez, Officer Alexander Gonzalez, and Officer Rocky Roman, through their attorneys Marquis Aurbach, Craig R. Anderson, Esq., canderson@maclaw.com

/s/ Bhavani Raveendran

One of Plaintiffs' Attorneys